

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: ZIMMER DUROM HIP CUP  
PRODUCTS LIABILITY  
LITIGATION

2:09-cv-04414-SDW-MCA  
MDL-2158

This Document Relates To All Cases

**NOTICE OF MOTION FOR  
RECONSIDERATION OF JUNE 7,  
2018 ORDER GRANTING  
MOTION FOR DISBURSEMENT  
OF FEES AND EXPENSES FROM  
COMMON BENEFIT FUND AND  
EXPENSES AND FOR A STAY OF  
THAT ORDER**

To: All Counsel via ECF

COUNSEL:

PLEASE TAKE NOTICE that, on a date to be set by the Court, Plaintiffs' Co-Liaison Counsel shall move before the Hon. Susan D. Wigenton, U.S.D.J. at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, pursuant to Local Rule 7.1(i), for reconsideration of the Court's June 7, 2018 Order granting the motion of Waters & Kraus LLP for disbursement of fees and expenses from the common benefit fund; and for an Order staying, and ultimately vacating, the June 7, 2018 Order.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, the

undersigned intends to rely upon the accompanying Memorandum of Law and the Declaration of Christopher A. Seeger.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Federal Rules of Civil Procedure, a proposed form of Order is attached.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby requests oral argument.

Dated: June 15, 2018

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